

RECEIVED

NOV 29 2023

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CLERK, U.S. DISTRICT COURT
ST. PAUL, MINNESOTA

Maniama
moone

vs.

Case No. 23-mc-113 PJS
(To be assigned by Clerk of District Court)

Hamline University

DEMAND FOR JURY TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in
this lawsuit. Please attach additional sheets
if necessary).

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff



Name Maniama moone

Street Address 1536 Hewitt Ave, Box 1501

County, City Ramsey, Saint Paul, MN

State & Zip Code Saint Paul, MN, 55104

Telephone Number (612) 791 - 2390

SCANNED

NOV 29 2023

U.S. DISTRICT COURT ST. PAUL

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1 ↓

Name Hamline University
 Street Address 1536 Hewitt Ave,
 County, City Ramsey, Minnesota
 State & Zip Code MN, 55104

b. Defendant No. 2

Name Deans of Students
 Street Address 1536 Hewitt Ave, MS - C1901
 County, City Ramsey, Minnesota
 State & Zip Code MN, 55104

c. Defendant No. 3

Name Hamline University
 Street Address Residential Life
 1536 Hewitt Avenue, MS - C1903
 County, City Ramsey, MN, Saint Paul
 State & Zip Code MN, 55104

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☒

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

Back side →
 Dean of Student
 employee's

Sydney De, Lambro ;
Patti[♥], Kensten ; Dean
Carios seed. vice president
David[♥] Everett
Yolanda Hansen;
Director residential life

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? *(check all that apply)*



Federal Question

☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name:

State of Citizenship:

Defendant No. 1:

State of Citizenship:

Defendant No. 2:

State of Citizenship:

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☒

6. What is the basis for venue in the District of Minnesota? *(check all that apply)*



Defendant(s) reside in Minnesota



Facts alleged below primarily occurred in Minnesota



Other: explain

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7. Direct statement on 7 pages)

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached:



Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

Demand request for (\$300,000,000)
(Three million) for the violation of
ms. moone civil rights under Title IX
and the violation of negligence and
neglect, private nuisance, sex-gender
racial discrimination
University Title IX violation
Stalking, sexual harassment, Breach of contract

Signed this 2023 day of November 29th

Signature of Plaintiff Mariama Moore

Mailing Address 1536 Hewitt Ave,
Box 1501, Saint Paul, MN

55104
Telephone Number (612) 791 2390

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.

November 19th 2023,

From: Mariama Moore

Re: Direct Statement

Moore's Direct Statement

Title IX VIOLATIONS

1) The United State Department of Education's Office for Civil Rights (OCR) enforces Title IX, Title IX prohibits discrimination based on sex in education programs that receive Federal Financial Assistance. Non-compliance Ms.Moore has a right to bring a Civil Lawsuit against Hamline University Educational Institution. And she has the right to seek monetary damages and request an injunction to stop discriminatory behaviors;

2) In order for behavior to meet the standards of harassment; SEX, involves discrimination against a protected class of people, involves unwelcome behavior, involves offensive conduct, and involves level of severity or pervasiveness that has affect and harm the plaintiff Ms. Moore ability to study, work and function at Hamline University.

3) The plaintiff Ms. Moore has been affected and harm by the private nuisance, hostile learning environment, traditional sex-gender based harassment, sexual harassment, racial harassment, and stalking. Some examples that Ms.Moore has been affected and harmed by are;Retaliation Harassment, Psychological Harassment and Abuse, Personal Harassment, Power Harassment,

Intimidation. Ms. Moore has been a victim of Sexual bullying, bullying, mobbing at Hamline University.

4) The Plaintiff Ms. Moore moved into the Schilling Dorm Hall on August, 24th as a First Year Transfer student. She moved in and settled into her dorm room on the second floor of Schilling Hall. On her side there were two incidents that occurred between two students during this 30 day time frame. Ms. Moore start becoming a targeted of stalking, sex-gender base harassment, and sexual harassment. The first incident started with a Hispanic Male name Trey Oliver that lived next to Ms. Moore dorm room this male started to follow, bother and harass Ms. Moore on multiple occasions Ms. Moore reported this incident to the Deans of Students Ms. Patti and she reported the other incident with the other student with her about Paige Larson

5) Paige Larson has had multiple incidents with the victim and plaintiff Ms. Moore the first incident was around August 24, 2023 the first week of the school year. When this White Woman started pacing back and forth in the hallway in front of her dorm room and slamming her dorm room door and pacing out the back entrance doorway of Schilling Hall. Ms. Moore room is down from this student Paige Larson that was causing the private nuisance which at the same time Ms. Moore started to experience more targeted harassment from not all but maybe another 5 students on the second floor of Schilling Hall.

6) The disturbance with the back door entrance way continue to go on for about another 3 - 4 weeks before Ms. Moore made any sort of report to the Dean of Students or about the loitering around the back entrance way near Ms. Moore or in front of Ms. Moore dorm room door; This was the same thing with Trey Oliver with him linkering and loitering around Ms. Moore dorm room door and this student Paige Larson linkering and loitering and having conversation with her friends in front of Ms. Moore dorm room door also.

7) Paige Larson has engaged in Targeting the victim and plaintiff Ms. Moore in Personal Harassment, racial harassment, sex-based gender discrimination, This student was and has been engaging in this activity against Ms. Moore on numerous occasions; From her violated the

Minnesota State Law of Harassment Under Minn. Stat. § 609.748: This student(s) also violated the Hamline University Policy and Code of Conduct also;

8) Under Minn. Stat. § 609.748: This student Paige Larson was picketing out the back entrance way and pacing back and forth and her behavior was erratically; In Minnesota Targeted Residential Picketing which includes; Marching, Stomping or Patrolling by one or more person(s) directed at solely at a particular residential building in the manner that adversely affects the safety, security, or privacy of an occupant of the building or; marching, standing, or parolling, by one or more person(s) which prevents an occupant of a residential building from gaining access to or existing the property on which the residential building is located. Or; a pattern of attending public events after being notified that one's presence is harassing another.

9) Paige Larson has also had other incidents with her following Ms. Moore to the bathroom when she her Ms. Moore leaving out of her room and following Ms. Moore when she leaves out her room, This White Woman has also knocked on Ms. Moore door after Ms. Moore reported her to the Deans of Students for the private nuisance, and sex-based gender harassment and racial discrimination, This student has also verbally assaulted Ms. Moore in front of another Residence Assistant that cause Ms. Moore, to fear for her safety and feel intimidated , has been targeting and trying to provoke Ms. Moore got into a physical altercation and fight with her.

10) During the verbal altercation she yanked her dorm room door open and approached Ms. Moore's door where the Residence Assistant was standing and started yelling at Ms Moore and Pointing her finger at Ms. Moore and that is when the Residence Assistant told her to go back into her room; RA is a witness to it and public safety docketed it in the system from the verbal harassment from her. This student has also open Ms. Moore dorm room door when Ms. Moore left her door unlocked and she came into Ms. Moore dorm room and played around on Ms. Moore personal computer and put Ms. Moore computer in indigo mood when it takes a person to do which was the same day that she followed Ms. Moore outside of her dorm room to the bathroom and this was after Ms. Moore made reports about her to the Deans of Students

11) The other student(s) on the floor; Oliver Lind, Mel Leverich, Paige Larson, Trey Oliver, Aryana Sprague, Tori Gray, Owen Solberg, Bri Cook, Zach, Emelie, Eli Baron, have all been mobbing and gang stalking Ms. Moore and causing a Private Nuisance Ms. Moore sent out a courtesy email asking students to not engaging in slamming their doors and they continue to do it the RA included and slamming that back entrance doorway and loitering and hanging around and near Ms. Moore Dorm Room Door.

12) Under Minn. Stat. § 609.748: These students have been engaging in: repeated and pattern(s) incidents of intrusive or unwanted attention, acts, words, gestures, that have substantial adverse affect or are intended to have a substantial adverse effect on the safety; security and privacy of another which in this case is the plaintiff Ms. Moore regardless of the relationship between the victim or the alleged harasser(s).

13) These student(s) inside of the dorm room of Schilling hall and inside and throughout the entire school has engaged in targeting and gang stalking and mobbing Ms. Moore; and engaging in and violating Civil Harassment and Criminal Harassment; Civil Harassment is the injury to an individual because of a protected class or sex; it is also abuse, threats of abuse, stalking, sexual assault, or serious harassment by someone you have not dated and do NOT have a close friend or family relationship with; like a roommate or neighbor or a friend. (that you have never dated). Civil harassment has caused and harm Ms. Moore emotionally as a whole Civil harassment occurs when unsolicited acts disrupt someone's normal life and is directed towards a targeted individual.

14) This student harassment from threats, intimidation of knowing and willfully course of conduct directed at a specific person which is the victim Ms. Moore in this case that seriously has alarm, annoyed, her for her entire fall semester; and Ms. Moore has also been getting stalked, and gang stalked mobbing; which is a deliberate attempt to force Ms. Moore out of the classroom and the dorm rooms; by general harassment; emotional abuse/terror, and humiliation (Ganged). Ms. Moore has asked Hamline University for a no contact policy - and she has reported the incidents to Most of a the Residence Life Workers in the Office which has not helped enforce any of the schools rules, or policy or code of conduct; There was also an incident with these

students with them throwing noodles in front of Ms. Moore dorm room door and the RA did do or conduct nothing about it.

15) The plaintiff Ms. Moore has also been made fun of and humiliated about her teething flaw; These student(s) would rush and mobb Ms. Moore dorm room door every single day throughout the entire fall semester with watching a clock and showing up at Ms. Moore dorm room every since day throughout the entire fall school semester for 5 months until winter break at 00:32 timing; 00:32 throughout the entire day as well these students have also try to embarrass Ms. Moore by talking about teeth and making teething sound effects, and keep talking about teeth or doing acts and gestures about teeth and harassing and bullying Ms. Moore about her flaw, and refused to stop bothering and harassing Ms. Moore and spreading rumors.

16) The Plaintiff Ms. Moore has also been stalked, students have been stalking Ms. Moore the entire fall semester since she been living inside of the Schilling Hall on the second floor; and Ms. Moore has been engaged but most of all the entire floor try to excluded Ms. Moore which is sex - based gender discrimination; Stalking is a form of sexual misconduct when based on gender or related to any sort of intimate partner relationship; Stalking; is a pattern of repeated and unwanted attention; harassment contact; or any other sort of course conduct directed at a specific person that would cause a reasonable person to feel fear; or; Simple Obsessional The behaviors can involve overtly criminal behavior or seemingly non- criminal innocent behavior, according to the department of justice

17) The Plaintiff Ms. Moore has also been treated differently by the (RA) residence assistant of the floor; she has repeatedly been targeting and harassing Ms. Moore her name is Valentine Hernandez she has been targeting Ms. Moore since she has been inside of the dorm room she has knocked on Ms. Moore repeatedly about noise complaints and has falsely accused Ms. Moore of having marijuana drug use in her dorm room, She has random repeatedly knocked on Ms. Moore door on a Saturday afternoon at 12pm - 1pm about Ms. Moore and her friends entering her dorm room door; which was not quiet hours and only courtesy hours she does not knock on anybody else door or make an reports on them; repeatedly knocking at someone door could become

harassment in the State of Minnesota; The door and the act of knocking is recognized as a legitimate interference in a person's life and and she been harassment as a resident student;

18) These student Valentine Hernandez, and Paige Larson and the other girls on the floor have been engaging in targeting the Plaintiff Ms Moore in sex-based gender harassment; Paige Larson and some of the other 5 students listed above have engage in personal harassment, and racial harassment, sex - based harassment against Ms. Moore; and VA Valentine Hernandez as a (RA) Resident Assistant has engaged in Power Harassment against Ms. Moore; Power harassment is a kind of behavior in which a Superior takes advantage of his or her position to cause Ms. Moore emotional distress. Due to Superiority by her relative position but she does not treat anybody else with this sort of disrespect and treatment. And it has affected me at all sorts of hours when I'm trying to study. Ms. Moore has also been experiencing Power Harassment by Hamline University policies and code of conduct that has targeted control by limiting my rights, freedom, and access to basic education, employment and housing.

19) Hamline University and Hamline University Residential office has Breach the contract with Ms. Moore, and has Breach a duty with Ms. Moore; they have engaged in Negligence, and Intentional Infliction of Emotional Distress, They have neglect Ms. Moore confidentiality from her complaints and reports; and the Residential office has also engaged in the Negligence of the Rules, and policy and code of conduct of the student housing living dorm rooms. And this includes the tort for the Private Nuisance, Defamation, invasion of privacy.

20) The "Private Nuisance" has affected and harmed Ms. Moore individual right to enjoyment of some of the property and full access to the University and the Dorm Room Hall, or activities and does not affect the community at whole. This "Private Nuisance has violated Ms. Moore is right. Involves one's property in a manner that causes significant harm to another individual's use or enjoyment of their private land.

21) Ms.Moore has the right to successfully sue for the "Private Nuisance" too because she rent or; lease the property and has a valid contract with them; the defendant(s) created or maintained a condition that was harmful to my health; indecent or offensive; or obstructed free use of the

property; and did not consent to the person's conduct; The conduct and their student(s) conduct interferes with the enjoyment use of the property, the conduct has been reasonably annoying and disturbing to Ms. Moore and she was in fact harmed by emotional intentional infliction; study being disturbing and sleep too by the student misconduct the seriousness of the harm outweighs public benefit of the conduct.

22) Hamline University Staff and Faculty has allowed a hostile living and learning environment Ms. Moore has been harmed by both especially the hostile learning environment too; the hostile learning environment; School and Classroom and some of the Professor engaging in the annoyance of the hostile learning environment; The situation of sex - gender discrimination occurring and creating a harmful and intimidating environment for Ms. Moore and creating fear, a University Culture that has limited, denied, and interferes with Ms. Moore's ability to gain full access to the education she paid for, and access of the benefits from the student employment, programs, activities and sports, due to the sex-based gender racial harassment and excluding Ms. Moore.

(Quid pro quo)
hostile living environment
deliberate

23 TITLE IX: States: NO person shall in the United States shall; on the basis of sex be excluded from participating in; OR; be denied the benefits of; or be subjected to sex- based gender harassment under an education program; or activity; receiving Federal Financial Assistance and Ms. Moore rights as a student has been violated far as her being excluded and harassed based on sex discrimination;

24) Ms. Moore has made repeated complaints and reports to the Deans of Students Faculty Members Ms. Patti the Vice President of TITLE IX and the Vice President Carlos Sneed and David Everett, and we had a formal meeting about the reports of the incidents about what's been occurring and they did not follow any of the policies and code of conduct of Hamline University; and I feel some sort of retaliation and I have faced retaliation harassment; and them refusing to help and neglecting the situation and the incidents that have been occurring since August and I feel like they do not want to help me out because of my sex and some sort of sexual harassment because I am a Black African American Female and I spoke with two Black Faculty Members that work in the Deans of Students that refuse to help and move the student. And The White

Woman Ms. Patti said they opened up an investigation but they did not comply with the committee of Hamline University. And they try to tell me to move dorm rooms where the harassment would still continue and after I made the complaints and reports I experience and encounter MORE harassment at 00:32 mobbing to be excluded and left out and forced to move out of my dorm room; and retaliation is unlawful prejudice

25) The Plaintiff Ms. Moore has been affected and emotionally harm and she is subjected to demand Monetary Damages in the amount of \$1,000,000 (one million dollars) and other damages examples: for her tuition and student loans to be reimbursed back to the United States Department of Education and to be cleared off her credit report; and for her failing grades to be forgiven due to the stress and emotional distress and her PTSD worsen and the intentional infliction of emotional distress.

on \$300,000,000
(three million) for compensatory damages on punitive non-economic damages.

in demanded due to Pain & Suffering
Loss of enjoyment of Life, Emotional
anguish, Diminished quality of Life
Loss of Consortium.

due to the violation of Title IX
and the negligence, Breach of Contract
and Premises Liability

Important Notice to Respondent

If you are served with these papers, one of the following has happened (see attached papers for specifics):

- A temporary harassment restraining order has been issued against you. A hearing has been scheduled.

OR

- A temporary harassment restraining order has been issued against you. A hearing has not been scheduled. **You have 20 days from the date of service of the Temporary Restraining Order to request a hearing.**

OR

- A harassment restraining order has not been issued at this time. A hearing has been scheduled.

Review the attached papers carefully.

What is a Harassment Restraining Order?

A person who is a victim of harassment may seek a restraining order from the Court. The parent or guardian of a minor who is the victim of harassment may seek a restraining order on behalf of the minor. The restraining order prohibits harassment. A restraining order may be issued against an individual who has engaged in harassment, or against organizations that have sponsored or promoted harassment.

What is Harassment?

Under Minn. Stat. § 609.748, harassment is defined as:

1. A single incident of
 - a. physical or sexual assault, or
 - b. stalking in which the victim's personal information is used by another without consent of the victim, to invite, encourage, or solicit a third party to engage in a sexual act with the victim [See Minn. Stat. § 609.749, subd. 2 clause (8)], or
 - c. intentionally disseminating a private image of the victim, without consent of the victim, that shows the victim in a sexual act or whose intimate parts are exposed, in whole or in part, and the victim is identifiable by the victim or by another person or from personal information displayed in connection with the image. (See Minn. Stat. § 617.261).
2. Repeated incidents of intrusive or unwanted acts, words or gestures that have a substantial adverse effect or are intended to have a substantial adverse effect on the safety, security or privacy of another, regardless of the relationship between the victim and the alleged harasser.
3. Targeted residential picketing, which includes:
 - a. marching, standing, or patrolling by one or more persons directed solely at a particular residential building in a manner that adversely affects the safety, security, or privacy of an occupant of the building, or

- b. marching, standing, or patrolling by one or more persons which prevents an occupant of a residential building from gaining access to or exiting from the property on which the residential building is located.

4. A pattern of attending public events after being notified that one's presence is harassing to another.

Change of Address:

It is important that the court knows your mailing address to send you notices. If your mailing address changes, give court administration (<http://mncourts.gov/Find-Courts.aspx>) your new mailing address.

Hearing:

If a temporary restraining order has been issued, you have the right to ask for a hearing. You have 20 days from the date the petition is served to file a Request for Hearing with the court. You will be required to pay a civil filing fee unless the judicial officer has waived the filing fee due to the allegations in the petition. Review the *Order Regarding Fee Waiver in Harassment Restraining Order Proceedings* to see if the filing fee has been waived.

State of Minnesota		District Court	
County		Judicial District:	
		Court File Number:	
		Case Type:	Harassment
Petitioner(s)		Order Regarding Fee Waiver in Harassment Restraining Order Proceedings [Minn. Stat. § 609.748, subd. 3a; 42 U.S.C. §§ 3796gg-5(a); 3796hh(c)(4)]	
vs			
Respondent(s)			

If the judicial officer did not order your filing fee waived, you may complete and file a fee waiver application (*Affidavit for Proceeding In Forma Pauperis*, IFP102) that would be reviewed by a judicial officer who would determine whether to waive your filing fee based on your income. Fee waiver forms are available from the court administrator and online (<http://mncourts.gov/GetForms.aspx?c=19&p=69>). The court will notify the parties with a date and time to appear for a hearing.

Violations:

You may be charged with a misdemeanor, subject to a sentence of up to 90 days in jail and/or a fine of \$1,000.00, if you are aware of the existence of a restraining order and you violate it. Some repeat violations are gross misdemeanors that may result in a sentence of up to one year in jail and/or a \$3,000.00 fine. Other violations are felonies that may result in a sentence of imprisonment for up to five years and/or a fine of \$10,000.00.

You may be arrested and taken into custody without warrant if a peace officer has probable cause to believe you are in violations of the restraining order. You will be held in jail for at least 36 hours, excluding the day of arrest, Sundays, and legal holidays, unless you are released earlier by a judicial officer. Violation of the restraining order also constitutes contempt of court. See Minn. Stat. § 609.748, subd. 6 (<https://www.revisor.mn.gov/statutes/cite/609.748#stat.609.748.6>).

ST. PAUL POLICE DEPARTMENT SUMMARY INCIDENT REPORT



REPORT NUMBER: 23815977

INCIDENT INFORMATION

INCIDENT CODE 2637	INCIDENT TYPE Harassment-Phone Calls	INITIAL <input checked="" type="checkbox"/> DATE/TIME STARTED 10/01/2023 01:32 AM	DATE/TIME ENDED 10/17/2023 01:32 AM	DATE/TIME REPORTED 10/17/2023 06:44 AM
REPORT FILED FROM ***	TRACKING NUMBER T23007330	LOCATION OF OCCURRENCE 1485 Englewood Avenue, 203, SAINT PAUL, MN		APPROVED BY: 488400/Craig Nelson
LOCATION TYPE School - College/University	THEFT TYPE	METHOD OF ENTRY	PT OF ENTRY	ENTRY LOC

PERSON LISTINGS

1	TYPE	LAST NAME	FIRST NAME	MIDDLE NAME	DOB	RACE	SEX	LICENSE/ID #	STATE
	Victim	Moore	Mariama		***	***	*		
	SSN	RESIDENT	AGE	EMAIL	CONTACT PHONE		CELL PHONE		
				mmoore25@hamline.edu	***				
	RESIDENCE ADDRESS								

	EMPLOYER NAME				WORK PHONE				
	BUSINESS ADDRESS								

NARRATIVE

I live inside of the Hamline University Schilling Dorm room 203 and I have been experiencing crucial student harassment every single day since I moved into the dorm room. I talked with the school but I wanted to file a formal complaint with the police department I been having people slamming there dorm room. Doors lotier around the back doorway and my door and harassing me and my dorm room by pacing crowding and lotier around my door every single day at 00:32 and yelling fucking Joe and harassing my dorm and annoying and harassing me and I want to file a restraining order too so the school can do a non contact and remove of the student or the police department.. this has been going on for about 45 days now and the talking about teeth and keep running and rushing to my dorm room door every single day at the same time and hanging around my dorm and engaging in the psychological harassment and mobbing and these are other students living on the Schilling Dorm room floor that have mental health conditions and that won't stop the stalking and harassment and the gang stalking and the random targeted behavior, for the sex based harassment and discrimination here at the residential life the university said they sent a notice and announcement but its still crucial and a private nurisance

I am willing to prosecute.

- Is audio available? = [No]

October 14th, 2023

Mariama Moore's

Statement

Title IX Violations

MOORE'S TITLE IX STATEMENT

1) My name is Mariama Moore and I am a first year transfer student at Hamline University I have been a victim of sex - based title ix discrimination violations at Hamline University: I am seeking a settlement in the amount of \$100,000,000 Millions Dollars cause this sex based harassment discrimination has been ongoing I have been getting harassed non-stop inside of the Hamline Schilling Hall Dorm rooms since I have been a student here and I have been faced with traditional harassment as well as title sex harassment

2) It has been a hostile learning environment as well as a hostile living environment here at Hamline University. I have reported these hostile harassment incidents numerous times to the Dean of Students office and their public safety team and they haven't anything about the learning environment or the living environment they still have these students living and going to the Hamline University institutions after I have made formal complaints with the school, The Dean Ms. Patti Kersten said that she engaged with these students, and I do not think she has because the situation is still ongoing and consistently.

3) I have been excluded from girls/woman inside of the classrooms as well as at the events and these girls/woman have been insisted on traditional harassing me at Hamline University they have been ongoing with the annoyance, and the aggravating of the annoying words, and gestures and I have been a student on student on student sex- based discrimination. Due to the Hostile Hallway environment from the private nuisance the Schilling Dorm this has affected the enjoyment of me staying inside of the dorm room and affect the whole community at whole as well as inside of the classrooms as well.

4) The hostile learning environment here at Hamline University is a situation that has not been stopped and it has been ongoing and I have been forced inside of the classrooms to engaged with students that I do not want to have engagement with due to the hostility and the animosity coming from these other students inside of the classrooms and the professors do not do much about the situations at hand this situation due to the quid pro quo environment is concerning and it is a stressful situation for me.

5) The hostile learning environment is concerning as well as the living environments these students are supposedly were talked to by the Deans of Students office and if they have they have been refusing to stop the traditional sex based discrimination and harassment at the school. I Ms. Moore have been discriminate against harassed, bully due to the disparaging speech or nonverbal communication from humor that belittles or demeans me as a student I'm a law student pre law student and I take law up so I'm into politicians and every single fucking day people are going around with words and slurs and saying (fuck joe) and slurring the (Nigger) word around.

6) This hostile living environment causes emotional stress, post trauma stress disorder, feeling of fear, frustration and helplessness. And no faculty member here has helped the situation or arranged for a move out date. Also I have been consistent with the follow up process and nothing seems to have changed and the situation hasn't been separated. This is a civil matter at hand/ criminal but an investigation needs to be conducted.

7) This title ix statement is a formal complaint against the Hamline University Minnesota District because I want to take legal action against them in a civil action for a settlement of a Millions dollars due to the sex-based harassment and discrimination. And how the hostile learning environment causes fear and embarrassment and a setting that limits, denies, or interferences with my ability to participate in or on behalf of the education, educational institutions to gain proper knowledge and my Bachelors Degree, and interference with the overall activities and events at the school.

8) Under the Minnesota Federal and State has this anti- discrimination laws is defined as conduct that has the purpose or effect of unreasonably interfering with an individual's work or academic performance or in creating an uncomfortable, hostile, intimidating, and offensive learning environment: and I have not been attending the courses here and my grades are dropping and flunking and my financial aid pays for my scholarships and grants and it is a waste of time and my money. And I also have been excluded from Hamline University Hiring me and finding student employment for me. I have \$3,000 in student work and I went out for the cheerleader

squad and they did not select me to be a part of the team at the try outs. And I have been limited, and deny to be a part of the educational overall.

9) I have been avoiding things so I would not be retaliated against or stop things from escalating from becoming more intense or serious; the bothersome, and the annoyance and the target harassment is so severe and aggravating. I have made formal reports with the Saint Paul Police Department and due to the title ix violations as well as the stalking and harassment.

10) There has been hostile hallway(s) due to the teasing, bullying and sexual harassment inside of the school at Hamline University. According to the association for supervision and curriculum development and American Psychological its a form of sexually harassment. I been living on campus for 30 days now and nothing has changed in the Living environment as well.

11) and I have been experiencing high level of stress and from these random strangers, talking about teeth and coming and loitering around my dorm room at 00:32 annoying me and the the harassment does not stop at there these people have been random students and strangers coming to my door and running and loiter around the hallways at 00:32 on the time sometimes I can barley study read, or do my homework or exams. Like someone watching my dorm room and there clocks at 00:32 is mad weird behavior and its annoying and aggravating and I have explained this to the deans of students as well as public safety about the incidents that have occurred.

12) and I do not like the fact that they tell me to participate inside of the course classrooms and no other student engage and want to participate with me out of the blue, so random like we

would have a group assignment and these girls/woman would literally sit there like they don't see me or do not acknowledge talking with me same with the boys/and man. And I'm not gay I am a Black African American Woman 28 and the school deans of office have done nothing and public safety the same and they have been neglecting the whole situation. I do not know what type of conduct meeting they have or what policies they go by but it's bothering me and it is causing me not to want to engage at all for the sex based harassment and discrimination. Like do not tell me to participate and then nobody participates with me then I'm not going to participate with you the feeling is mutual. And completely ignoring me like i'm directly talking to you after I ask you to stop doing something and it is disrespectful because my aid pays for my tuition.

13) I try to go over to the Hamline University Library and the motherfuckers over there are always loud inside of the library and their faculty members are always engaging in a hostile environment and my tuitions pays for me to use everything at and inside of the library I mainly need to go there for printing off my assignments and using the internet and computer and then they always engage in indirect and direct harassment there; and they school is responsible because they do not check in or do any sort of disciplinary actions with there faculty members.

14) This type of racial sex based - discrimination has been happening often and occurs right in front of educators and this has been affecting my life emotionally and academically since I have arrived here. I have been experience all of this Quid Pro Quo Harassment as well as the Harassment part/ and from the hostile hallways, students that experience this talk less and class and find it hard to pay attention due to the indirect and direct harassment. Including skipping school. Harassment is against the law and Title IX of the Education Amendments of 1972 and

this is a violation of my civil rights in the State of Minnesota, including sexual harassment discrimination due to my sex- and gender identity in Federally Funded Schools, Programs, and activities. And an Anti- Anti-Bullying Policy.

15) The Deans of Students has not stop the harassment all together and I keep reporting and following up because it keeps coming back up and it's annoying and aggravating and the school has engaged in the negligence of the residential life for the housing unit for the students. As well as the classrooms.

16) Title ix: prohibits gender - based harassment, which is unwelcome conduct based on a student's sex, harassing conduct based on a student's failure to conform to sex stereotypes. Sex - Based harassment can be carried out by school employee's, other students, and third parties. *including male and female students, LGBT students, students with disabilities, and students of different races, national origins, and ages. Title IX protects all students from sex-based harassment, regardless of the sex of the parties, including when they are members of the same sex.*

Sex-based harassment creates a hostile environment if the conduct is sufficiently serious that it denies or limits a student's ability to participate in or benefit from the school's program. When a school knows or reasonably should know of possible sex-based harassment, it must take immediate and appropriate steps to investigate or otherwise determine what occurred. If an investigation reveals that the harassment created a hostile environment, the school must take prompt and effective steps reasonably calculated to end the harassment, eliminate the hostile environment, prevent its recurrence, and, as appropriate, remedy its effects.

17) I also have been experiencing Psychological Harassment (mobbing) is an unethical or destructive way of reacting to a situation or behaving towards a person. Psychological harassment is defined as negative or hostile behavior, by one more person directly or indirectly targeting a third person. stalking and other constant aggressive behaviors from one individual to another. This is frequently referred to as mental assault and emotional abuse. Annoying, involves discrimination against a protected class, involves offensive conduct, includes unwelcome conduct, involves some level of severity or pervasiveness that affects your ability to work.

3) Persecutory: People with this type of delusional disorder believe someone or something is mistreating, spying on or attempting to harm them (or someone close to them). People with this type of delusional disorder may make repeated complaints to legal authorities (Gang Stalking).

4) To oppress or harass with ill-treatment, especially because of race, religion, gender, sexual orientation, or beliefs. 2. To annoy persistently; bother: persecuted the babysitter with foolish questions. In 1990, California became the first state to establish a stalking law after several high-profile stalking cases that ended in murder. Predatory stalkers are obsessed by deviant sexual desires and unusual practices. Once they have selected their victim, their early behaviors are driven by gaining information, proximity and preparing for a potential attack.

Where proper local authorities need to get involved with this case and this title ix discrimination complaint is URGENT.

Thank you,

Mariama Moore